

**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

UNITED STATES OF AMERICA)	
)	
v.)	CASE NO: 3:21-CR-00440-M
)	
RICHARD SPEIGHTS, JR. (3))	

RICHARD SPEIGHTS, JR.'S UNOPPOSED MOTION FOR RELEASE OF PASSPORT

Former Defendant Richard Speights, Jr., by and through his counsel of record, respectfully submits this Unopposed Motion for Release of Passport, and in support thereof would show the Court as follows:

On January 24, 2023, consistent with the conditions of his release imposed in the above styled and numbered cause at that time, Mr. Speights surrendered his passport to the United States District Clerk, as reflected by the Clerk's Receipt for Surrender of Passport (Dkt. No. 69). On May 15, 2023, the Court entered its Order Dismissing the Indictments with Prejudice (Dkt. No. 165), thereby ending the criminal proceedings against Mr. Speights. As a result, the above styled and numbered cause has been terminated and Mr. Speights is no longer subject to any condition requiring the surrender of his passport. Accordingly, Mr. Speights hereby respectfully requests that the Court enter an Order authorizing the United States District Clerk to release his passport back into his custody.

WHEREFORE, PREMISES CONSIDERED, Mr. Speights respectfully requests that this Motion be, in all things, GRANTED, and that the Court enter an Order directing that the United States District Clerk release Mr. Speights's passport to him.

Dated: June 5, 2023

Respectfully submitted,

By: /s/ Gene R. Besen

GENE R. BESEN

Texas Bar No. 24045491

Email: gbesen@bradley.com

ELISHA J. KOBRE

Texas Bar No. 24127663

Email: ekobre@bradley.com

LANE M. WEBSTER

Texas Bar No. 24089042

Email: lwebster@bradley.com

BRADLEY ARANT BOULT CUMMINGS LLP

1445 Ross Avenue, Suite 3600

Dallas, Texas 75202

Telephone (214) 257-9800

Facsimile (214) 939-8787

ATTORNEYS FOR RICHARD SPEIGHTS, JR.

CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of June, 2023, a true and correct copy of the above and foregoing document was filed electronically with the Clerk of the U.S. District Court for the Northern District of Texas to be served upon all counsel of record by the Court's electronic filing system.

/s/ Gene R. Besen

GENE R. BESEN

CERTIFICATE OF CONFERENCE

I hereby certify that counsel for Mr. Speights has conferred with counsel for the Government, DOJ Trial Attorney Lee Hirsch, regarding the foregoing motion and that he is unopposed to the same.

/s/ Gene R. Besen

GENE R. BESEN